

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK**

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**SECURITIES AND EXCHANGE  
COMMISSION,**

**Plaintiff,**

**v.**

**SPONGETECH DELIVERY SYSTEMS,  
INC., RM ENTERPRISES  
INTERNATIONAL, INC., STEVEN Y.  
MOSKOWITZ, MICHAEL E. METTER,  
GEORGE SPERANZA, JOEL PENSLEY,  
and JACK HALPERIN,**

**Defendants.**

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**Civil Action No. 10-CV-2031 (DLI)  
(JMA)**

**[PROPOSED] ORDER**

Based upon the Affirmation of Maranda Fritz and all prior proceedings, and good cause appearing:

IT IS HEREBY ORDERED that:

1. Subject to the conditions and limitations set forth herein, bank accounts of Business Talk Radio and its affiliates (“BTR”), numbered 540203874, 540205812, 540204070, and 540204799, at Patriot National Bank, and all other bank accounts of Business Talk Radio including First Bank of Greenwich accounts 0010074045, 0010074053 and 0010074061 shall remain released from the Court’s freeze order of March 14, 2011 for the sixty day period from this date through June 15, 2011.

2. In accordance with the parties’ agreement, the temporary and partial release of BTR accounts called for in this Order is subject to the following terms and conditions:

(a) Metter will relinquish all authority, including signatory authority over all BTR accounts;

(b) BTR shall expend funds only for ordinary and current business expenses such as payroll, insurance, station expense, leases, taxes, and rent, and shall provide documentation to the SEC of its receipts and disbursements every two weeks from the date of this Order;

(c) BTR shall make no payments to or for the benefit of Steven Moskowitz, RM Enterprises International Inc., RM Enterprises International Ltd. or 5M Marketing Corp.;

(d) Mr. Metter may continue to be employed by BTR during the sixty day period, and he may continue to draw only his current and ordinary bi-weekly salary from BTR, not to exceed \$9,375.92, and may not receive other disbursements from BTR including bank payments, loans, bonuses, stock or other compensation (cash or otherwise);

(e) Metter shall receive his salary through a single identified account and shall only use those funds to pay specific living expenses as agreed upon with the SEC or ordered by the Court, and shall provide documentation of receipts and disbursements; and

(f) BTR shall represent and confirm that its stations are currently being offered for sale and will continue to be offered for sale;

(g) BTR shall open no other bank accounts without first notifying the SEC;

(h) Jeff Weber, Executive Vice President of BTR, shall certify and declare that he has read and understands the contents of this Order and that he will comply with this Order;

(i) At the expiration of the sixty day period, Mr. Metter may apply to the Court to extend the temporary and partial abatement of the freeze as it relates to the BTR accounts, and the SEC reserves its right to object to that application. Upon such further application, the defendant reserves the right to argue that the assets of BTR are beyond the scope of the Opinion and Order

of March 14, 2011, and the SEC reserves the right to oppose such motion.

Dated: Brooklyn, New York  
April 15, 2011

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Dora L. Irizarry  
UNITED STATES JUDGE